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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:	:	Chapter 11
LTL MANAGEMENT LLC, ¹	:	Case No. 23-12825
Debtor.	:	
	:	

APPLICATION FOR ADMISSION PRO HAC VICE OF MICHAEL H. CASSEL

I, Steven M. Abramowitz, am a partner with the law firm Vinson & Elkins LLP and am a member in good standing of the bar of this Court. My New Jersey attorney registration number is 043641990. Pursuant to Rule 101.1 of the Local Rules of the United States District Court for the District of New Jersey and Rule 9010-1 of the Local Rules of Bankruptcy Procedure for the District of New Jersey (the “Local Bankruptcy Rules”), I move for the *pro hac vice* admission of Michael H.

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

Cassel to practice in this Court for the purpose of representing Cyprus Amax Minerals Company as an interested party, in the above-captioned case. In support of this Application, the undersigned respectfully represents to the Court as follows:

1. Mr. Cassel is an associate of the law firm of Wachtell, Lipton, Rosen & Katz, with his office located at 51 West 52nd Street, New York, New York 10019. Mr. Cassel's telephone number is (212) 403-1047, and his facsimile number is (212) 403-2047. Mr. Cassel's e-mail address is mhcassel@wlrk.com.
2. As stated in the *Certified Statement of Michael H. Cassel in Support of Application for Admission Pro Hac Vice*, which is attached hereto as Exhibit A and incorporated herein by reference, Mr. Cassel has been a member in good standing of the Bar of the State of New York since 2017 and is admitted to practice in the Southern District of New York, Eastern District of New York, and the Supreme Court of the United States. Further, as set forth in his Certified Statement, Mr. Cassel is experienced in bankruptcy matters and is familiar with the provisions of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and the Local Bankruptcy Rules.
3. With reference to all matters incident to this case, Mr. Cassel submits to the disciplinary jurisdiction and the civil jurisdiction of, and agrees to be subject to the orders of, the United States Bankruptcy Court for the District of New Jersey for any alleged misconduct that occurs in the course of this chapter 11 case.

WHEREFORE, the movant respectfully requests that the Court enter an Order, substantially in the form attached hereto as Exhibit B, admitting Michael H. Cassel to appear before the Court *pro hac vice* in this case.

Date: May 24, 2023

/s/ Steven M. Abramowitz

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